

# SEALED

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

FILED

OCT 23 2019

CLERK, U.S. DISTRICT CLERK  
WESTERN DISTRICT OF TEXAS  
BY \_\_\_\_\_ DEPUTY

THE UNITED STATES OF AMERICA )

Plaintiff, )

v. )

JUAN GERARDO TREVINO-CHAVEZ )  
aka "HUEVO", )

Defendant. )

SA 19 CR 0787 JK

**GOVERNMENT'S MOTION TO SEAL INDICTMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and files this its Motion to Seal the Indictment in this cause, and would show the Court as follows:

I.

On this date the United States has submitted to the Grand Jury a proposed indictment naming the Defendant in this cause, and the Grand Jury has returned a True Bill of Indictment. Because the Defendant has not been arrested and is not otherwise in custody, premature disclosure of this Indictment in the public record may afford the Defendant an opportunity to avoid apprehension. Such disclosure may additionally disrupt an on-going criminal investigation.

Accordingly, the United States respectfully requests that this Court order that the indictment, warrant for defendant's arrest, and documents relating to this indictment remain sealed; provided, however, that a redacted copy of the indictment shall be delivered to the defendant at the time of said defendant's initial appearance (conducted pursuant to Rule 5, Fed.R.Crim.P.), or

arraignment (conducted pursuant to Rule 10, Fed.R.Crim.P.), whichever is applicable.

The United States further respectfully requests that this motion and the Court's order remain under seal.

Respectfully submitted,

JOHN F. BASH  
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